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Nass Timber Supply Area, Summary of Public Input

Nass Timber Supply Area

(Formerly the Kalum-North Area of the Kalum Timber Supply Area)

Summary of Public Input

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This is a summary of the public input that has been received on the Timber Supply Review in the Nass Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

Background

As part of the review of timber supply in the Nass Timber Supply Area (previously the Kalum North Area of the Kalum Timber Supply Area), the British Columbia Forest Service distributed a *Discussion Paper* and three technical reports: the *Timber Supply Analysis* and *Addendum*, and the *Socio-Economic Assessment*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information. This report summarizes the input that was received during the 90-day review period. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut for the Nass Timber Supply Area.

The first section of this summary outlines the public review process implemented by the Forest Service and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. A final section summarizes the public input which was submitted to the Nisga'a Tribal Council. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Privacy Act*) can be reviewed at the Kalum Forest District Office in Terrace.

Public Review Process and Response

Kalum Forest District staff actively solicited public input on the Timber Supply Review in the Nass through the following actions:

- information sessions and an open house following the release of the *Timber Supply Analysis* in March, 1993 (see Table 1)

- direct mail-out of the four documents to approximately 70 individuals and organizations following release of the *Discussion Paper* and the *Socio-Economic Assessment*. The *Discussion Paper* included a response form which readers were encouraged to complete and return to the district manager

- local radio, television and newspapers ran interviews and editorials, and were briefed on all reports

- Forest Service staff offered to provide information sessions to interest groups and elected officials after the release of the *Discussion Paper* and *the Socio-Economic Assessment* in July, 1994

- two open houses and public meetings were held in October, 1994 (see Table 1)

As Table 1 indicates, 71 individuals attended the information sessions held in March 1993, and 23 attended the open houses/public meetings in October, 1994.

The Nisga'a Tribal Council have been involved in the Timber Supply Review in the Nass Timber Supply Area in partial accordance with their Interim Protection Measures Agreement with Canada and British Columbia. Several meetings were held with the Tribal Council throughout the process. The Nisga'a views on current forest management practices and their impacts on the timber supply were presented in an appendix of the *Discussion Paper*. The Nisga'a included a response form with this appendix to solicit public input on issues of concern to them. The five submissions received by the Nisga'a Tribal Council are included in this summary.

Eleven written submissions were received by the Kalum Forest District, including a review of the Forest Service analysis commissioned by Buffalo Head Forest Products Limited and North Coast Timber (*Review of the Ministry of Forests' Kalum North Timber Supply Analysis,* December 1993) this document is referred to as the 'timber industry critique' in this summary. Appendix 1 lists the sources of

the submissions.

Activities (No. of participants)	Date
Information sessions held in 1993	
Media briefing (3)	March 3, 1997
Nisga'a Tribal Council (5)	March 8, 1997
Kalum TSA	
Steering Committee (10)	March 9, 1997
Gitksan (1)	March 9, 1997
Regional District of	
Kitimat-Stikine (5)	March 9, 1997
SBFEP Operators (3)	March 19, 1997
District of Kitimat (10)	March 22, 1997
District of Stewart (8)	March 23, 1997
Open houses/public meetings	
Stewart (15)	March 23,1993
Terrace (8)	October 6, 1994
Stewart (15)	October 12,1994

Table 1 Participation in public information activities.

Public Input

In this section, public input on the information presented in the four Timber Supply Review documents for the Nass is summarized under the following headings:

- timber supply analysis
- socio-economic assessment
- discussion paper
- responses to Nisga'a questions

Public input on other issues which may influence timber supply in the Nass in the future are summarized at the end of this section.

Timber Supply Analysis

Timber industry critique

The following is a summary of the comments made in the timber industry critique regarding the data used in the Forest Service timber supply analysis:

- **estimates of timber productivity**

The critique suggests that Forest Service analysis estimates of timber productivity for regenerated forests are underestimated for 90 per cent of the timber harvesting land base because they are based on the existing mature forest, not the inherent productivity of the land. The use of revised timber productivity estimates is projected to approximately double the long-term timber supply.

This potential underestimation is described as a serious flaw which distorts the long-term sustainable timber supply level, resulting in public concern and severe short-term consequences for harvest levels and forest management policy. The critique suggests this factor may also lead to less husbandry, the overlooking of employment opportunities or the distortion of public decisions about future land use planning. The critique indicates there is enough evidence of underestimation to require a complete re-analysis.

- **size of the timber harvesting land base**

The critique suggests the timber harvesting land base used in Forest Service analysis should be increased by 11 per cent (29,852 hectares) for the following reasons:

- **environmentally sensitive areas**

The critique suggests that the reductions for environmentally sensitive areas used in the Forest Service analysis are too high, especially for sensitive soils in the Upper Nass Zone. The 1970 classification of the soils in this area applied the classification of highly sensitive soils generously because it was not yet known that areas with these soils would be deducted from the timber harvesting land base.

- **non-merchantable forests**

The deduction of forests identified as non-merchantable from the land base in the Forest Service analysis is acknowledged to be reasonable. However the quantity of forests in this category is suggested to be too high due to inventory inaccuracies and the lack of allowances for change. The critique concludes that the timber harvesting land base should be 15 per cent larger to reflect current market conditions and the changing economics of timber harvesting.

- **losses to future roads**

The critique suggests the losses to future roads are two per cent higher than expected.

- **volume estimates for existing mature timber**

Based on field evaluations, the critique indicates that the amount of mature timber in existing forests is overestimated in the Forest Service analysis. The critique observes that this may be because the reduction factors for decay were inadequate. The critique's assessment suggests that the volume of mature timber is likely less than the 95 million cubic metres estimated in the Forest Service analysis.

The implications of these data issues were examined in the timber industry critique. It was found that adjusting the timber productivity for regenerated forests, while maintaining the land base used in the Forest Service analysis resulted in an 82 per cent increase in the long-term sustainable timber supply (746,200 cubic metres per year). Increasing the timber harvesting land base in combination with changing the productivity estimates resulted in further long-term timber supply increases to 906,000 cubic metres per year (221 per cent above the Forest Service forecast). If timber growth were projected to increase over time, the long-term sustainable timber supply is projected to be even higher.

The critique concludes that until the Forest Service completes a more precise study of the size of the timber harvesting land base and improves timber productivity estimates it is uncertain whether the allowable annual cut should remain the same for the next five years or be reduced.

Other Public Input

- **Size of the timber harvesting land base**

Four submissions suggest that the net productive timber harvesting land base is underestimated; three cited changing markets and technology, one cited an overestimation of roads and environmentally sensitive areas.

One respondent notes the land base used in the Forest Service analysis is 70 per cent less than that used two years ago in the ***Status Report for the Kalum-North portion of the Kalum Forest District.***

- **Forest growth and yield estimates**

Three respondents indicated the timber productivity of sites currently occupied by old-growth forests is seriously underestimated. One referred to the analysis completed for Orenda Forest Products Ltd. by Dr. Don Reimer, which concluded the average growth rate for Orenda's operating area is likely higher than 4.0 cubic metres per hectare per year, almost twice the estimate used in the Forest Service analysis. Adjusting this estimate effectively increases the projected long-term timber supply level by 237 per cent to 970,000 cubic metres per year.

Many submissions acknowledge that forest productivity affects the long-term timber supply; one suggests the long-term level should be 1,250,000 cubic metres per year. Two submissions state that current forest productivity estimates reduce the area within the low productivity class (which was deducted from the timber harvesting land base) and reduce green-up periods.

One submission states that the growth and yield projections and sensitivity analysis shown in the Forest Service analysis are weak; another recommends further studies into site productivity and notes that an underestimation of productivity may limit the range of resource management options available.

One respondent notes that research has proven that managed forests yield seven to 10 per cent more timber than natural forests and suggests that this information should have been incorporated in the Forest Service analysis

- **Amount of existing mature timber**

One respondent does not agree that the Variable Density Yield Predictor used in the Forest Service analysis overestimated existing timber volumes by 10 to 20 per cent.

- **Timber inventory**

One respondent notes the timber inventories on 61 mapsheets in the Upper Nass are outdated.

Socio-Economic Assessment

One respondent suggests accepting the assessment as it is written.

The following comments include suggested improvements to the assessment and views on topics raised in the report:

- **Environmental concerns**

One respondent notes that since quantitative wildlife studies have not been done in the area, it is difficult to identify what might be damaged.

- **Economic impacts**

Four respondents indicated log export from the Nass Timber Supply Area should end, with the resulting wood supplied to local mills. One added that local fibre processing facilities should be constructed.

One respondent suggests research should focus on developing timber product mixes and new markets. Another suggests new secondary milling facilities and value added techniques should be encouraged and that by-products of timber production, such as co-generation using hog fuel for energy, should be developed.

Two respondents note that forest uses for recreation, tourism, education, research and alternative resource manufacturing should be encouraged. One suggested pine mushroom harvesting as an economic opportunity.

- **Employment impacts**

Two submissions suggest the value of present and future employment be considered in the determination. One indicates it is not necessary to protect future jobs at the expense of present jobs.

One respondent states that the *Discussion Paper* suggests it is appropriate to presume a conservative economic growth rate until a higher rate can be substantiated. The respondent suggests this approach could lead to economic disruption and job losses without increasing environmental protection.

- **Community impacts**

One respondent suggests increasing benefits from the forest resources received in Stewart, Kitwanga, the Hazeltons and the small Nass communities would be beneficial, but not at the expense of businesses in Terrace and Kitimat.

Three respondents provided comments about the community of Stewart: one suggested Stewart should focus on processing wood rather than exporting it; another supplied a lengthy list of opportunities to help sustain Stewart; a third suggested a new tenure, with a requirement to locate a manufacturing plant in Stewart, and an option to obtain wood from existing forest licenses.

Another suggests that once a project, such as the recent proposal for a new mill, has been found to be in the Province's interest, the chief forester should not jeopardize it by reducing the harvest rate. Furthermore, the Forest Service analysis shows a range of reasonable actions that do not conflict with the project.

Discussion Paper

- **Creating a new Timber Supply Area**

Three respondents support the creation of a new timber supply area. One suggests dividing the Kalum Timber Supply Area allowable annual cut between north and south based on the boundaries identified for the Kalum North area. Another respondent indicates the new timber supply area should be created only if it is economical.

Two respondents suggest adding parts of the Cassiar Timber Supply Area to the Kalum North (Nass) area and increasing the harvest level to reflect this addition. Another notes any boundary changes should have been rationalized prior to the Timber Supply Review.

Two respondents suggest Stewart should be the headquarters of the new Kalum North (Nass) timber supply area; another suggests the location should be central; a third indicates the existing Kalum Forest District office is appropriate.

One respondent questions the validity of creating a new timber supply area in light of the uncertainties relating to First Nations treaty negotiations and the Forest Service analysis.

Priorities within the new timber supply area are offered:

- two respondents suggest improving inventories; one of these also emphasized the need for planning

- one submission recommends that comparisons of historical harvest rates should be completed, with an examination of whether forest management objectives are being met. Additionally, the new unit should foster economic growth and diversification based on local timber utilization

- **Nisga'a involvement in the Timber Supply Review**

Two respondents question the validity of the Nisga'a analysis, citing specific examples. Concern was expressed about the special appendix for the Nisga'a Tribal Council in the *Discussion Paper*, about section 8.4 of the Interim Protection Measures Agreement with the Nisga'a Tribal Council, and the Minister of Forests' letter to the Nisga'a Tribal Council which states 'a very significant reduction in the allowable annual cut (in the Kalum-North(Nass)) will undoubtedly be necessary'. Another respondent notes a balance is required between resource management planning and equal authority for Aboriginal perspectives.

- **Allowable annual cut adjustment**

Suggestions were provided on whether and how the allowable annual cut should be adjusted:

- two submissions respondents advocate a reduction in the allowable annual cut- one suggested a reduction to the long-term sustainable timber supply level in the Forest Service analysis; another recommended a 25 to 30 per cent reduction

- one respondent indicates the current allowable annual cut should be maintained, and urged moderation in the event that it is reduced

One submission suggests the existence of uncut timber in the Forest Service Reserve means that available timber supply is higher than estimated, and that this may compensate for any overestimation in the existing mature timber. Another notes this timber should not be included in the determination until a license is granted for harvesting.

There was some concern about the adequacy of the information and the analysis. Two respondents note that improved information and analysis clarify the need for immediate are required before the allowable annual cut is reduced.

One respondent indicates the Kalum North (Nass) allowable annual cut should not be determined in isolation from the surrounding areas; it should not make up for timber supply shortages elsewhere, nor be artificially high unless a local processing sector is developed. Another submission notes the allowable annual cut must be determined apolitically.

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Responses to Nisga'a Questions

This section summarizes the responses to the questions the Nisga'a Tribal Council posed in the appendix of the *Discussion Paper*. The number of respondents providing similar answers is noted in brackets following each response.

Whose needs are addressed with the approach taken by this Timber Supply Review?

- large corporations and major licensees (2)
- not local residents (2)
- wishes and aims of Stewart and processing facilities outside the region (1)
- not indigenous people (1)

One submission notes that the chief forester must consider information that best reflects current forest management practices, public input, and the social and economic implications of his decision

Will current forest management practices, as defined by the Ministry of Forests, sustain the forest in the Kalum North (Nass)? Will they sustain the societies that depend on the forest? For how long?

- no (2)
- forests in the Kalum North (Nass) and the societies and economies that depend on these forests will be sustained forever at a lower rate than the current allowable annual cut (1)

How do we move from today's economy and social structure to a more diverse, sustainable economy and social structure?

- a value-added facility is needed within the timber supply area (2)
- more small scale alternative logging operations, more community forests, smaller tenures (woodlots), and an infrastructure to implement these initiatives (2)
- diversifying an economy takes time and a free market economy, with less government intervention and more risk-taking is preferred (1)
- a more equitable public input process is necessary (1)
- forest and ecology research, restoration programs and equal consideration of other values (1)

Shouldn't we consider reducing our logging to sustainable levels now rather than leave the problem to our children, and theirs?

- yes (3); one suggests the decision be deferred until the Nisga'a forestry studies are incorporated in the analysis, one mentions that a processing facility within the timber supply area and a reduction of fibre flow outside of the timber supply area would compensate for the local economic impacts of timber supply adjustments

- decision should be conservative (1)

- Nisga'a knowledge about forestry in Kalum North (Nass) is being ignored; the Ministry of Forests has a narrow perception of forestry, and the probable inaccuracy of the timber supply analysis could result in an unsustainable harvest rate (1)

- the analysis did not consider where the Nisga'a live or their willingness to experiment with non-conventional forestry (1)

- the long-term timber supply level may actually be higher than stated in the review, thereby making the need for an immediate harvest level reduction less critical (1)

- recent yield revisions, which increased the long-term timber supply level, are an attempt to justify the continuation of unsustainable harvesting (1)

- the review dealt exclusively with timber quantity rather than quality (1)

- the review failed to note the Kalum North (Nass) area has been massively overcut (1)

- if utilized, opportunities in back country recreation, education and research could double employment in five years (1)

- the Ministry of Forests' suggestion of partial cutting in stream-side zones and harvesting in physically and environmentally marginal areas is not acceptable (1)

In addition to answers to the questions posed in the *Discussion Paper*, the Nisga'a received the following general input from single respondents:

- the Minister of Forests' social and economic objectives should not be considered by the chief forester

- Kalum North (Nass) resources have been undervalued and squandered; Orenda's wood supply should be restricted to ensure that demand drives the economic return from the forest resources and thereby enhances the future of Nass timber supply area communities

- there was a discrepancy between the discussion paper and the analysis report, in that the discussion paper states that volumes may be overestimated by "as much as 10 per cent" while the timber supply analysis report states "by about 10 per cent"

- if commercial thinning becomes a widespread practice, it will decrease rotation ages, which will then limit the capacity of the site to sustain economic activity and biological vitality; increased production demands on poor and medium sites without incremental silviculture can lead to site

degradation and reduced site productivity; the 250 year rotation age recommended by the Nisga'a is more acceptable

• since losses to pests and fire will increase, the land base is smaller than defined for the timber supply analysis

Related Issues

Comments on government processes in the Nass Timber Supply Area are summarized here to indicate perspectives on issues that may influence timber supply in the future:

- **Protected Areas Strategy**

A Protected Area was recommended around the Little Brown Bear Canyon near Highway 37 North.

- **Forest management practices**

One submission recommends changing practices from large clearcuts and ground-based skidding to patch retention and creating spatial diversity in the forest. Another suggests that unlogged areas around lakes, water courses and other riparian areas should be wider and could incorporate values for recreation, spiritual solace, forest ecosystem networks, research, aesthetics and tourism.

- **Timber Supply Review process**

Some submissions made specific comments about the Timber Supply Review Process:

- individual input should not be summarized

- the discussion paper failed to recognize issues that were identified in the timber industry critique for the Kalum North area, while the Kalum South analysis examined these issues

- since all timber supply areas must be reviewed within a short time frame, Ministry of Forests planning and inventory functions have been diverted from more urgent tasks

- information provided by consultants on forest productivity estimates and long-term timber supply level should have been included in the discussion paper. Furthermore, the paper should have stated there is no need to panic as revisions can be made every five years and will incorporate better information

Appendix 1

Submissions received by the Kalum Forest District

Government agencies
District of Stewart
Regional District of Kitimat-Stikine

Forest industry
Orenda Forest Products Ltd.
Skeena Sawmills (West Fraser Mills Ltd.)
Skeena Cellulose Inc.
Sterling Wood Group Inc.-"Review of the Ministry of Forests' Kalum North Timber Supply Analysis (December 1993)", commissioned by Buffalo Head Forest Products Ltd. and North Coast Timber

ALM Wood Group

First Nations
Nisga'a Tribal Council

Individuals
Three

Submissions received by the Nisga'a Tribal Council

Individuals
Five